



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 25, 2022

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Bradley Pierre, et al.,
22 Cr. 19 (PGG)

Dear Judge Gardephe:

I write to inform the Court that the Government is available for the initial conference in this case on January 31, 2022, or at any other time convenient to the Court next week. In addition, the Government respectfully requests that the Court exclude time under the Speedy Trial Act through the date of the initial conference set by the Court.

The Government submits that this request would be in the interest of justice. Among other things, the Court recently approved the parties' proposed protective order in this case, and with the entry of that order, the parties are continuing their initial meet and confer obligations, including discussing discovery plans in advance of the Court's initial conference. All defendants have consented to this request.

Thank you for your consideration of this request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
MATHEW ANDREWS
LOUIS A. PELLEGRINO
Assistant United States Attorneys
Tel. (212) 637-6526 / 2617
matthew.andrews@usdoj.gov
louis.pellegrino@usdoj.gov